

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: PHARMACEUTICAL INDUSTRY)	MDL No. 1456
AVERAGE WHOLESALE PRICE)	Master File No. 01-CV-12257-PBS
LITIGATION)	
_____)	Declaration of Michael J. Prame in
THIS DOCUMENT RELATES TO:)	Support of Oxford Health
_____)	Plans, LLC's Memorandum of Law
01-CV-12257-PBS AND 01-CV-339)	in Opposition to Defendants'
_____)	Motion to Compel
_____)	

Pursuant to section 1746 of Title 28 of the United States Code, I, MICHAEL J. PRAME, declare as follows:

1. I am an attorney and principal with the firm Groom Law Group, Chartered, counsel for Oxford Health Plans, LLC ("Oxford") in the above-captioned matter.
2. I submit this Declaration in support of Oxford's Memorandum in Opposition to Defendants' Motion to Compel.
3. Attached as Exhibit 1 to this Declaration is a true and correct copy of the subpoena that Defendants issued on Oxford on April 19, 2004.
4. Attached as Exhibit 2 to this Declaration is a true and correct copy of a letter dated June 28, 2005 from Jessica Gorden Cortes of Patterson Belknap Webb & Tyler to Mark Sandmann of Rawlings & Associates.
5. Attached as Exhibit 3 is a true and correct copy of the transcript of a motion hearing held on February 2, 2006 before the Honorable Marianne B. Bowler.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 18, 2006

/s/ Michael J. Prame